

# OSBORN LAW P.C.

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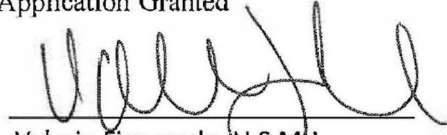
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April 26, 2023

## VIA ECF

Honorable Valerie Figueredo  
United States District Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: 4-27-2023

The parties' proposed amended briefing schedule contained herein is adopted. The Clerk of Court is directed to terminate the motion at ECF No. 20.

Re: *Govan v. Commissioner of Social Security*  
Civil Action No. 1:22-cv-08997-VF

Dear Judge Figueredo,

We write on behalf of plaintiff, Sara R. Govan, and with the consent of the defendant, to request a 45-day extension of time to serve plaintiff's motion for judgment on the pleadings as per the November 10, 2022 Scheduling Order. Plaintiff's motion for judgment on the pleadings is due on April 28, 2023. Plaintiff respectfully requests an extension of time up to and including June 12, 2023. This is plaintiff's first request for an extension. Due to illness, Plaintiff's counsel is unable to make the current deadline and due to scheduled Social Security briefs, additional time is necessary.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- a. Plaintiff served a written proposal for settlement on counsel for the Commissioner on **February 27, 2023**;
- b. The Parties filed a joint letter stating that they intend to proceed to briefing on their respective positions on **March 29, 2023**;
- c. The Defendant filed the e-CAR on **March 29, 2023**;

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- d. Plaintiff to file her motion for judgment on the pleadings on or before **June 12, 2023**;
- e. Defendant to file its response/cross-motion on or before **August 11, 2023**; and
- f. Plaintiff to file her reply (if any) on or before **September 1, 2023**.

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn

Daniel A. Osborn

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cc: Michael Corona, Esq. (by ECF)